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02/26/2008 09:45 AM

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Subject Problem Formulation Ecological Risk OU3

Bonnie

## ADMINISTRATIVE RECORD

Thanks for getting this out. Wish we could had gotten it sooner. A brief look at the Conceptual Site Model causes some concern over the issue we have talked about previously, research project. As we have discussed, it is my responsibility to sell this to my management as being the appropriate path to complete a proper RIFS for OU3. We have forwarded the information to MWH for their eco-risk people to review, but I would like to point out a couple of thing to you as a none eco person that bothered me.

I have attached Figure 3-3 Conceptual Site Model for Asbestos OU3. In particular I will note mammals. First, in several instances the pathway for inhalation is noted: *believed to be complete and to provide an important contribution to the total risk to the receptor*. It has been my understanding that, because of the life cycle of most mammals and the chronic nature of asbestos related lung cancer, this pathway is considered incomplete. So I am concern first with the classification and then with the leap to it providing an important contributing factor to risk.

Next, I have attached the first page of the draft Conceptual Site Model for OU4. I have highlighted a section related to exposure related to ingestion to LA. The text says that while there might be some exposure, it is believed to be a minor source of risk. EPA has been down playing risk due to ingestion at OU4. When I look in Figure 3-3 at mammals for ingestion, there are several instances where it is noted: *believed to be complete and to provide an important contribution to the total risk to the receptor*. Again, I am not sure how we got to the important contributor position. This could also create some problems with the what Libby currently thinks about ingestion exposure.

The other aspect that says research, is when the the problem formulation starts calling for spiking water samples when the results from on-site water samples don't so any toxicity. If the water is not toxic, it's not toxic and we have no impact. We should be finished not researching what levels are needed to spike for an impact.

Are we losing site of the goal of the eco-risk assessment, which is to determine if there has been an impact on the population. Most obvious in the impact on population.

We will see you on Thursday.

Bob



Fig 3 3 Conceptual Site Model Asbestos OU3.PDF OU4 Conceptual Model.PDF